

Miller & Chevalier

Kirby D. Behre
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February 10, 2023

VIA EMAIL

Elan I. Baret
Baret Law Group
3999 Sheridan Street, Suite 200
Hollywood, FL 33021

Christopher Scott Salivar
Christopher S. Salivar, P.L.L.C.
6576 Whispering Wind Way
Delray Beach, FL 33484

Re: *Azima v. Insight Analysis and Research LLC, et al*, 1:22-CV-20707; Additional Discovery Pursuant to the Court's Order Dated January 3, 2023

Mr. Baret and Mr. Salivar:

We write on behalf of our client, Petitioner Farhad Azima regarding the production of documents by Respondents Insight Analysis & Research LLC and SDC-Gadot LLC (collectively "Respondents").

As you are aware, on January 3, 2023, the Court partially granted our motion to compel production of documents. *See* ECF No. 62 at 2-3. The Court has ordered Respondents to produce the following: (1) bank records reflecting payments to vendors, subcontractors, and employees of Gadot Information Services ("Gadot Israel"), (2) accounting records relating to payments to entities on a list to be provided by Petitioner, (3) e-mails related to the movement of funds for transactions identified by Petitioner, and (4) WhatsApp, Signal, Silent Circle, and other messaging service communications relating to the movement of funds for transactions identified by Petitioner.

On January 25, 2023, you sent a small production of documents. However, the production only included financial records already within Mr. Azima's possession, messaging correspondence with Mr. Page within Mr. Azima's possession, and publicly available corporate filings for Respondents. Most of the documents appear to be documents provided by Petitioner to Respondents at their depositions. Indeed, out of the 862 pages produced by Respondents, the only

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documents Mr. Azima did not already possess some version of are sixteen pages of recent publicly available corporate filings renaming Respondents in Florida. Respondents' production obligations are far from complete.

Attached is a set of search terms ("Attachment A") for you to use to search bank records, accounting records, emails, and messaging applications, as required by the Court's order. As Respondents have taken the incorrect position that they have no documents to produce, please run these search terms and provide a summary of the hit counts for each term. Please also confirm your availability next week to confer regarding the ordered production.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kirby D. Behre".

Kirby D. Behre

Miller & Chevalier

TO: Elan Baret
Christopher Salivar

FROM: Miller & Chevalier Chartered

DATE: February 10, 2023

RE: Attachment A: Proposed Search Terms Pursuant to ECF No. 62

Search Term
(Beech OR Beach OR Project Beech OR Project Beach OR Beech Project OR Beach Project)
(Nariman OR Narim* OR Nari* OR Nar* OR Nar2* OR N2)
(Aviram OR Avi OR Azari OR Hawk)
(Page)
(Halabi)
(Del Rosso OR NDR OR Vital OR VMS)
(BMI*)
(Sublime*)
(Lavie)
(Insight w/5 GS* OR GSIA)
(omri48@gmail.com)
(Dinka*)
(Overseas w/5 Consulting)
(Telecom w/5 Florida)
(Ezekiel w/5 Golan)
(Gadot /3 Information)
(FusionGPS OR (fusion w/5 GPS))
(Global w/5 (analysis or impact))
(TPV Inventa)
(PandaFace)
(KMI Group)
(Yesodot)
(Hayarkon)
(Tekara)
(Tulloch)
(King w/5 drums)
(Azima OR Generator OR FA OR Farhad)
(Massaad OR Khater OR KM)
(Buchan* OR Jam* w/5 Buchanan OR Jamie OR JB*)

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(Gerrard OR Neil OR Quarterb* OR Dechert OR Hughes)
(Arusy OR Eitan OR Eithan OR George)
(Handjani OR Amir)
(Frank OR Andr* w/5 Frank)
(Staff w/5 Meeting)
(Mooseegg)